

EXHIBIT 101

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

DECLARATION OF TOM SULLIVAN

Pursuant to 28 U.S.C. § 1746(2), I, E. Thomas Sullivan, hereby declare as follows:

1. I am the President of the University of Vermont and State Agricultural College (“UVM”). I have served in this role since 2012.
2. I have either personal knowledge of the matters set forth below or, with respect to those matters for which I do not have personal knowledge, I have reviewed information gathered from UVM records and other publicly available information.
3. UVM is a public land grant university located in Burlington, Vermont. It is the largest institution of higher education in the State. UVM offers more than 100 majors in 7 undergraduate schools and colleges, 50 master’s degree programs, 27 doctoral programs, and an M.D. program through the Robert Larner College of Medicine. There are currently more than 10,500 undergraduate students, 1,500 graduate students, 800 certificate and continuing education students, and 450 medical students enrolled at UVM.
4. UVM’s mission as a public research university is to educate students, create and disseminate knowledge, and prepare our students to be leaders, change agents, and global citizens. To be successful in this charge, we must educate our students about the world in which they live and help them acquire the knowledge and skills necessary for successful and productive lives. Essential to achieving these goals are: having diversity among our faculty, staff and students to add intellectual and social vibrancy to the community; cultivating a respectful climate for all members of our community; supporting the development of cultural competency; providing a curriculum that teaches critical thinking and engages learners of different multicultural perspectives across all disciplines; and having co-curricular experiences that provide community members with opportunities to engage across differences, as well as to

develop and deepen critical life skills. For these reasons, a diverse and inclusive UVM community is a compelling institutional interest that is indispensable to achieving our goal of inclusive excellence.

5. UVM is committed to ensuring the safety, wellbeing, and educational success of all of its students, including those who may be undocumented immigrants. It is the practice of UVM to protect undocumented students to the maximum extent that federal law permits. UVM does not collect or maintain records regarding whether its students are undocumented immigrants, or more specifically, whether any students have been granted Deferred Action for Childhood Arrivals (DACA).

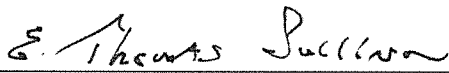
6. The repeal of DACA may affect students who are attempting to start, continue, or complete their education at universities and colleges in this country, including UVM. If DACA grantee students lose their work authorizations, they risk losing their jobs and their ability to pay for their education. DACA students who are enrolled in an educational program that requires employment in order to complete elements of the program, such as research or teaching assistant positions, may be impacted by the loss of work authorizations and they may be unable to meet the requirements of their degree program.

7. The impact from repeal of DACA would be felt at UVM. For example, as reported in a recent Vermont Public Radio interview, Juan Conde, a first-year medical student at the Larner College of Medicine identified himself publicly as a DACA recipient. *See* Kathleen Masterson, Vt. Public Radio, *Despite Risk, UVM Medical Student Comes Forward to Defend DACA Program* (Sept. 11, 2017).¹ In statements to the press, Mr. Conde indicated that his mother brought him to this country from Mexico when he was 9 years old and that he had

¹ Available at <http://digital.vpr.net/post/despite-risk-uvvm-medical-student-comes-forward-defend-daca-program#stream/0> (last visited Sept. 21, 2017).

dreamed of becoming a doctor ever since his mother died of cancer in 2007. *Id.* Mr. Conde further explained in his statement that, when his undocumented status prevented him from applying to medical school, he initially earned a Ph.D. in biochemistry in order to become a cancer researcher. *Id.* According to Mr. Conde, the DACA program enabled him to pursue his dream of attending medical school, and he recently began his studies at the Larner College of Medicine at the University of Vermont. *Id.* Repealing the DACA program would threaten the professional medical opportunities of Mr. Conde, and in so doing, could cause harm to UVM and the UVM community.

Executed on this 26 day of September, 2017



E. Thomas Sullivan

EXHIBIT 102

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
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DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Declaration of Javier A. Juarez

1. My name is Javier A Juarez, I am 28 years old, and I reside in Cranston, RI.
2. I have personal knowledge of the matters set forth below.
3. I was born in Peru where I lived until the age of ten prior to moving to Cranston, Rhode Island.
4. I grew up in Cranston, I graduated from Cranston elementary, middle and high School.
5. I went to the Community College of Rhode Island and graduated with an Associate's degree in General Studies. I also was granted a path to Rhode Island College to finish a bachelor's degree.
6. I applied for DACA soon after it was announced in 2012. I received DACA and a work permit. I immediately began to work to save money and help my parents with their home bills. DACA allowed me to work, pay taxes, and drive a vehicle.
7. Because of DACA, I was able to obtain a job with benefits such as insurance and a 401k. I was able to save enough money to return to school and finish my bachelor's degree at Rhode Island College.
8. DACA allowed me to pay taxes, rent an apartment, pay for tuition and purchase an automobile.
9. I was able to graduate Rhode Island College with a Bachelor's degree in American History in May of 2017.
10. On June of 2017, I was accepted to Brown University to pursue a Master's degree in American studies where I will be exposed to an ivy league curriculum which will help me become a better candidate to law school.
11. I am planning on applying to Harvard, Yale, Roger Williams University, and Stanford.
12. As the current situation stands, I will not be able to take out loans for law school because my work authorization will expire on December 18th of 2018.
13. Due to this, my dreams of becoming a lawyer and going to law school have been destroyed.
14. Fear of deportation has caused me and my family great physical and mental stress and has deprived me to focus on the education that I seek.

I declare under penalty of perjury that the foregoing is true and correct.
September 27, 2017

Javier A. Juarez

EXHIBIT 103

**UNITED STATES DISTRICT COURT
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CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Declaration of Paul F. Mutt

I, Paul F. Mutt, declare as follows:

1. I am currently the interim general counsel at Starbucks Coffee Company, and have worked at Starbucks for 19 years.
2. Since 1971, Starbucks Coffee Company has been committed to ethically sourcing and roasting high-quality arabica coffee. Today, with more than 25,000 stores in 75 countries around the globe, Starbucks is the premier roaster and retailer of specialty coffee in the world. Through our unwavering commitment to excellence and our guiding principles, we bring the unique Starbucks Experience to life for every customer through every cup.
3. Within the United States, Starbucks has over 8,000 company operated stores, and we employ over 180,000 partners (employees). We are proud of the fact that our partners reflect the diverse communities we serve. Inclusion and humanity are fundamental to who we are as a company and to how we approach our communities. We strive to be a place where everyone, from our partners to our customers, feels welcome and valued.
4. Today, more than 43% of Starbucks partners in the United States self-identify as minorities, including more than one in five who identifies as Hispanic or Latino. As a result of the increasingly diverse labor market, we will likely be a “majority minority” company within a few years. While young people from across the globe benefit from Deferred Action for Childhood Arrivals (DACA), the vast majority are youth who identify as Hispanic or Latino. In part because this population reflects a significant number of our partners, we support the young women and men – the “Dreamers” – who are part of the DACA program.
5. Nearly three quarters of a million hardworking youth are contributing to our communities and our economy because of the DACA program. DACA recipients must satisfy strict requirements, including a background check, attending school or having a GED or military service, and applying for work authorization. More than 91 percent of DACA recipients are now employed, contributing billions to our economy and our communities. Of those currently in school, more than 70 percent are pursuing a

1 bachelor's degree or higher. One recent study estimated that removing DACA workers
 2 would represent a loss of \$460.3 billion to the U.S. GDP over a decade. Indeed, we
 3 know that immigrants are twice as likely to start a new business than native born
 4 citizens and even 8 to 10 percent of undocumented immigrants do so. More than 40
 5 percent of Fortune 500 companies were started by an immigrant or the child of an
 6 immigrant. They represent the values of hard work, patriotism and hope that define
 America. They are our future. At Starbucks, we are proud to call them our partners.

7 6. We support bipartisan efforts to secure the future of Dreamers and the promise of
 8 America. On behalf of Starbucks, our founder and Chairman Howard Schultz wrote
 9 earlier this year on this matter to U.S. Senators Lindsey Graham and Richard Durbin.
 10 Last week, our CEO Kevin Johnson signed a pledge with many other companies to
 11 stand with Dreamers. We take these steps not only on behalf of the Dreamers we
 12 employ, but also on behalf of all our partners across the country who have come to
 expect Starbucks to be a responsible and inclusive employer.

13 7. Starbucks reimburses partners for the biennial fee required to stay in the DACA
 14 program. As of today, we are currently aware of at least 84 Starbucks partners who
 15 have sought reimbursement for the DACA fee. This is merely the number of partners
 16 who have sought reimbursement for the fee – the total of DACA partners is likely
 17 substantially more. These partners are employed in 18 states across the country,
 18 including the states of Washington and New York. They are contributing to our efforts
 19 to hire and create pathways for 100,000 opportunity youth. Our DACA partners include
 20 some who are the first in their families to attend college. Others serve on our
 21 Opportunity Youth Leadership Council. Their input to the Council ensures that we have
 22 a better understanding of how to attract and retain talent from minority communities
 23 and how best to employ the strength that these resilient young individuals bring to our
 workforce. We are a better company because of their contributions.

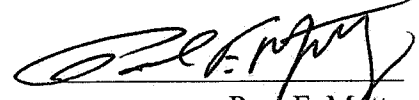
24 8. Having DACA partners supports the kind of diverse and creative workplace we seek to
 25 create and sustain at Starbucks. We recruit people to work where they live so we can
 26 reflect our community, creating meaningful connections with customers whose loyalty
 and repeat business drive our growth. Dreamers who have gained employment under

DACA represent so many of our customers – customers who either are immigrants themselves or the children, grandchildren, or friends of immigrants. We want to see these Dreamers benefit in ways our other partners have, through in-store training, covered health care, and, we hope, fully-funded access to higher education through our partner Arizona State University. We have seen through our hiring commitments to Opportunity Youth, Veterans & Military Spouses, and Refugees, how providing people with options for professional growth leads to workforce stability and lower turnover in a tight labor market. Our goal is to embrace and employ the next generation of diverse talent, which includes our current and future DACA partners.

9. In addition to working at Starbucks, our DACA partners are going to school, taking care of their families, and working toward realizing their own American dream. Our goal is that they feel as welcome and included as any other partner, and we strive to provide them the same opportunities. That is why we reimburse them for the biennial fee they must pay to stay in the program and why we have offered DACA-related services at our Opportunity Youth fairs. Still, we know this population faces many barriers, even with DACA. For example, legal impediments prohibit our DACA partners from taking advantage of our college tuition program with Arizona State University. It is thus critical that we voice our support and concern for these special young women and men. Without the ability to live lawfully and work in this country, hundreds of thousands of patriotic young people will be pushed back underground, including current Starbucks partners, unable to serve their families, their communities, our economy and, most importantly, their own futures. The impact of any changes restricting or ending the DACA program would have far-reaching negative implications well beyond those who participate in the program.
10. Starbucks will continue to stand with the hundreds of thousands of Dreamers impacted by today's announcement, including those we are proud to call Starbucks partners. These young people are in America through no fault of their own. They are contributing to their community and to the economy, and this is their home. Forcing them to leave is unacceptable.

1 I declare under penalty of perjury under the laws of the United States of America that
2 the foregoing is true and correct to the best of my knowledge.

3 Respectfully submitted,

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5 Paul F. Mutty

6 September 5, 2017
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EXHIBIT 104

**UNITED STATES DISTRICT COURT
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Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Pursuant to 28 U.S.C. § 1746(2), Martin Shively hereby declares as follows:

1. I am over the age of eighteen and competent to testify.
2. I am the Associate General Counsel for the U.S. Immigration Team at Microsoft Corporation ("Microsoft"). I manage the team responsible for providing immigration advice and support for Microsoft's businesses and its visa-dependent employees and their dependent family members, and ensuring the compliance of our immigration programs in relation to all applicable laws and regulations. I have been employed in this capacity since 2016.
3. Microsoft employs more than 46,000 employees in the State of Washington, and more than 73,000 employees in the United States.
4. The pursuit of Microsoft's mission on behalf of our customers around the world creates a substantial business need for finding, developing and attracting the brightest and most promising talent from around the country and around the world. We place a high priority on having a diverse workforce that can reflect the global customer base we serve and an inclusive culture as part of our core values. Our products and services, and ultimately our customers, benefit from input and contributions that draw from the diverse backgrounds found among our employees.
5. Microsoft has numerous outreach and recruiting programs including our College and High School Intern programs as well as DigiGirlz and YouthSpark which are designed to identify, attract and develop the most promising young talent in the country. Some of these programs are designed as direct recruiting programs and others are designed to increase interest in technology and computing more generally.
6. Microsoft's Global Talent Acquisition and HR organizations invest deeply in attracting and retaining the best employees to support our business strategies and our customers. Given the persistent demand for high skilled talent and the tightness of the labor supply for professionals in our industry, the costs of recruiting employees are high. Unanticipated turnover is incredibly disruptive to business plans.
7. Microsoft is currently aware of 39 beneficiaries of DACA that are employees or current or recent interns. These employees and interns were encouraged by Federal authorities to

identify themselves and apply for DACA status to avail themselves of discretionary deferred action and the benefit of employment authorization documents.

8. These DACA beneficiaries are working across a range of Microsoft's business divisions, developing the next generations of Microsoft products and services. We have DACA beneficiaries in the Office Products Group, which produces our industry-leading suite of productivity apps; the Windows and Devices Group, which is responsible for the software platform, apps, games, store and devices that power the Windows ecosystem; the Cloud & Enterprise Group, which builds the infrastructure software and developer tools that power our cloud platform and services; the Artificial Intelligence and Research Group, which drives our strategy for artificial intelligence and forward-looking research and development; and LinkedIn, our online professional network designed to help members find jobs, connect with other professionals, and locate business opportunities. DACA beneficiaries are also employed in positions within our Finance organization as well as our Worldwide Commercial Business and Retail divisions, which engage directly with our customers.
9. Microsoft invested in some of the DACA beneficiaries before they joined the company as full-time employees through various Microsoft programs designed to identify and develop the country's most promising talent including our DigiGirlz and YouthSpark programs.
10. Microsoft's intern program—in which some of these DACA beneficiaries have participated—is a key mechanism by which Microsoft's businesses identify and attract the world's top students.
11. While our DACA employees are generally early in career, their accomplishments, impact in their teams and promise for the future reflect their significant value to the company and our communities. They are Software Engineers helping advance the development of our cloud services and collaboration tools—products and services that are fundamentally changing the landscape of productivity and work across the Fortune 1000, small and medium-sized businesses, and startups. They are supply chain experts forecasting hardware inventory requirements. They are Retail sales associates connecting consumers with the value of our products and services. They are Financial Analysts supporting our businesses. Those who are employed at LinkedIn are in core positions, including product and engineering roles, with responsibilities that directly contribute to the organization's mission to connect the world's professionals to make them more productive and successful. Together, our DACA employees are contributing directly to the way businesses and individuals are pursuing digital transformation and their ability to re-envision their business models and embrace new, more effective ways of engaging their own customers and empowering their own employees, and transforming their own products. In short, these individuals are an integral part of the fabric of Microsoft's business today and our collective mission to empower every person and organization on the planet to achieve more.

12. The loss of DACA work authorization for these employees will disrupt projects and deliverables within the Office Products Group, the Windows and Devices Group, Cloud & Enterprise, the Artificial Intelligence and Research Group, LinkedIn, Finance, World-Wide Commercial Business, and the Retail division. Microsoft will incur tens of thousands of dollars in recruiting costs to replace employees lost by the revocation of DACA, involving expenditures in talent sourcing and lead generation, recruiter assessments, and team interviews. In addition, the loss of DACA employees would create business delays and disruptions for our teams as they adjust to the loss of valuable, trained and impactful employees.
13. Microsoft's investment in those who participated in our intern program will be lost with the rescission of the DACA program.
14. In addition to the direct cost to Microsoft businesses to attract, recruit and hire employees, the loss of our DACA employees would cause the company to lose its investments in training and career development for these individuals. Microsoft will also lose the potential for these employees to make significant future contributions over the course of their careers. The Microsoft community will suffer the loss of community with these dynamic, driven and bright DACA beneficiaries. Finally, the rescission of DACA will affect Microsoft's ability to recruit the most talented, qualified employees in the future. Once DACA is rescinded, beneficiaries of the program will no longer be able to take advantage of the educational and training opportunities available through our nation's educational system, through internships and outreach programs (such as those described above), and through on-the-job training in the U.S. technology sector. This will shrink the pool of available talent available to companies like Microsoft, and ultimately harm the competitiveness of the U.S. technology sector.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of September, 2017.


Martin Shively

EXHIBIT 105

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
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Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Pursuant to 28 USC § 1746(2), Natalicia Tracy declares as follows:

1. I am Executive Director of the Brazilian Worker Center (BWC), in my current position since May 2010.
2. The Brazilian Worker Center maintains its principal office in the Allston neighborhood of Boston, Massachusetts. It also has a satellite office in Bridgeport, Connecticut.
3. The Brazilian Worker Center is a grassroots, community worker center that supports immigrants, both men and women, on issues of workplace and immigrant rights. Through organizing, advocacy, education, leadership training, capacity building, civic participation, and policy analysis we promote our community's exercise of its civil and human rights, and a more just society for all.
4. The Brazilian Worker Center receives over 5000 members of the community annually at our offices, and distributes information to another 8000 at community fairs, churches, and festivals.
5. The Brazilian Worker Center is incorporated as an independent non-profit corporation, within the Commonwealth of Massachusetts, governed by its own board of directors, and is not a branch of any larger state- or national-level organization.
5. The Brazilian Worker Center is a modest-sized community-based non-profit, with a FY 2017 annual operating budget of \$487,000. Our organization currently has ten paid employees: eight in Boston MA and two in Bridgeport CT. Together with board members and regular volunteer staff, the core organizational team is 36 individuals who are the principal actors who carry out the work of the organization.
6. Currently, four people within this core team have DACA designation, and within the families of the core team another 11 individuals also have DACA.
7. If all the individuals linked directly to our work lose their DACA status, it would create a great deal of harm and instability within our organization. Some individuals would lose their jobs, and their families would suffer from the loss in income from those losing their work permits. They would have increased difficulty in making payments on automobiles and homes they have purchased with the employment and earnings stability afforded them by DACA, and have to suspend degree programs they have begun at colleges and universities.
8. Loss of DACA would especially cut the number of outstanding college students from local universities who work with us as interns, or are otherwise active in our community and connect with our work. Some of them have DACA, and they are particularly effective working with our community because of their strong work ethic, leadership abilities, and their cultural and linguistic competence, as they have native proficiency in English as well as Portuguese.

9. As an example of the kind of dedicated young college student in our community that we are referring to, there is the example of Carlos (a pseudonym), who lives in Framingham, Massachusetts. In Fall 2015, he entered UMass Boston as a transfer community college graduate and chose Political Science as his major. He came to the United States from Brazil with his mother and little sister when he was nine years old in order to join his father, already here, and grew up and went to school in Marlborough. The family overstayed their visa, and became undocumented, and later his father was deported to Brazil. He graduated from high school in 2010, and like a lot of other undocumented high school students at the time, despaired of ever being able to afford college. One of his good friends in a similar situation at the time, 17 years old, committed suicide by hanging himself. To afford the tuition for evening classes at Mass Bay Community College, triple the regular in-state rates, he worked every day for 10 hours in a factory, feeding scrap metal into a grinder, and his mom cleaned houses without taking a day off for 10 years. In 2014, he received DACA designation, and was able to begin full-time studies at the University for the first time. He is an effective and dedicated leader active in several organizations on and off campus, as well.

10. Another example is Clara (a pseudonym), who is from Brockton. She came to the United States from Brazil when she was five years old, accompanying her mother, brother and sister, traveling over the Mexican border in order to join her father who was already working in Minnesota. She sees her mother as a “hero for striving for a better life for her children.” The family lived there for a year before moving to Brockton, Massachusetts, where she grew up and went to school. She was an excellent student, and the first in her family to finish high school, and to even think about college. She won an Abigail Adams scholarship when graduating from high school, but being undocumented was not able to collect it. By 2007 her family were detained and deported, when she wasn’t at home, and since then she has been alone, self-supporting and studying at UMass Boston, where the high costs have slowed her progress. At UMass Boston, also, she won a privately endowed merit scholarship, but the university’s rules did not allow her to use it because of her immigration status. Clara gained DACA status in 2013, and by then had become a noted leader in student and youth organizations on and off campus. In June 2013, she was one of four undocumented students who as part of the national United We Dream Network’s “Operation Butterfly” traveled to the Mexican border in Arizona and visited with their deported mothers through the border fence, an event which received wide national media attention at the time, and coverage in the documentary film, *Indivisible*.

11. The Brazilian Worker Center is also a membership organization, with 1168 members. We estimate that at least 60 people among this group and their families have DACA designation.

12. Cancellation of DACA will increase the sense of crisis and dislocation in the wider community that we serve, as DACA recipients lose privileges such as work permits, drivers’ licenses, and in Massachusetts and Connecticut, instate tuition rates at public institutions of higher education. This broader crisis would definitely create more workload for us to handle at the BWC, by bringing many families to us in crisis, and

needing our support to help them – even as our ranks of staff, board and volunteers are diminished through the loss of DACA for key personnel.

13. Cancellation of DACA would also create more impediments to members of our wider community contributing volunteer time, resources, and energy to BWC operations, including membership fees and engagement in public, civic activities.

14. In sum, all this would greatly increase our work as an organization, and harm us financially. With more families in crisis, there would be fewer individuals secure enough in their own and their family members' situations to invest in pursuing the Center's work, including engaging in civic activities. We would also as an organization lose the services of highly qualified, committed, outstanding employees who could no longer work with us, and incur extra costs in having to hire others to replace them. Cancellation of DACA would also reduce the number of our volunteers, upon whose dedicated labor we count on to supplement staff efforts.

15. I confirm that I have direct, personal knowledge of the facts attested to in this declaration, from my position as Executive Director of the Brazilian Worker Center for the last seven years.

I declare all the foregoing under the pains and penalty of perjury,



Natalia Tracy

Executed on this 26th day of September 2017

EXHIBIT 106

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
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Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Pursuant to 28 U.S.C. Sec. 1746(2), I, Luis Cortes Romero, hereby declare as follows:

1. I am over the age of eighteen and competent to testify.
2. I am a licensed lawyer eligible to practice law. I am licensed in the State of California. My license number is CSB #310852. I practice exclusively in federal law in the state of Washington. We have offices located in Kent, Washington and Kennewick, Washington.
3. I am the managing attorney at Barrera Legal Group, PLLC ("Barrera Legal") for its Washington offices. I am responsible for managing the firm's overall administrative functions, as well as oversee the immigration cases handled by the Washington offices. I also am in charge of hiring staff for the Washington offices.
4. Barrera Legal is a small business with less than 15 employees between the two Washington offices. At least 5 of our staff members are beneficiaries of Deferred Action under the Deferred Action for Childhood Arrivals ("DACA") program. These staff members are located in both our Kennewick and Kent offices. These staff members work in a wide range of highly technical and extremely confidential capacities as they often help in case preparation for victims of domestic violence, human trafficking, and sexual assault. If these staff members lose their status and are removed from the United States, Barrera Legal, and the vulnerable and marginalized clients it represents will suffer significant loss.
5. Barrera Legal has always been committed to equal rights, diversity and advocating for those from marginalized communities. As Barrera Legal has grown, we have worked diligently to attract only the most qualified and talented people from all over the United

DECLARATION OF LUIS CORTES ROMERO

1 States, and believe this is one of the things that makes Barrera Legal stand out – a
2 diverse staff that can utilize its cultural capital to better help and understand our clients.
3 6. Moreover, as an immigration lawyer, I have helped several DACA beneficiaries either
4 renew their DACA benefit, or apply for it for the first time. A significant number of
5 these clients work with small business throughout the state of Washington. A common
6 concern amongst my DACA clients the expiration of their work authorization, and the
7 sudden loss of their employment. By the same token, I am often contact by concerned
8 small business owners from Washington asking what the business can do for their
9 DACA beneficiary employee so that the employee's work permit can continued to be
10 renewed, so that they do not lose a valuable employee.
11

12
13
14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on this 23rd day of September, 2017

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19 Luis Cortes Romero
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DECLARATION OF LUIS CORTES ROMERO

EXHIBIT 107

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Pursuant to 28 U.S.C. § 1746(2), Adam Greenberg hereby declares as follows:

1. I am over the age of eighteen and competent to testify.
2. I am Head of Legal and Public Policy for JAND, Inc. d/b/a Warby Parker (“Warby Parker”). I oversee Warby Parker’s legal, regulatory, governmental, and public policy affairs, including the impact of immigration law on Warby Parker employees. I have been employed by Warby Parker since March 2014.
3. Warby Parker employs more than 450 individuals in the State of New York; more than 1,200 in the United States; and more than 30 in Canada. Warby Parker’s employees work at the company’s corporate offices in New York, New York and Nashville, Tennessee; the company’s optical laboratory in Sloatsburg, New York; and the company’s retail locations in Alabama, Arizona, California, Colorado, District of Columbia, Florida, Georgia, Illinois, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, New York, North Carolina, Oklahoma, Oregon, Pennsylvania, Tennessee, Texas, Virginia, Washington, Wisconsin, and Ontario, Canada.
4. Warby Parker was founded in 2010 upon a mission to offer designer eyewear at affordable prices and to act as a leader among socially conscious businesses. Our co-founders set out to prove that businesses can scale and be profitable while also making decisions that consider the interests of multiple stakeholders—our customers, employees, community, environment, and shareholders.
5. Consistent with our mission is the belief that everyone has the right to see. Two and a half billion people around the world need glasses but don't have access to them; of these, 624 million cannot effectively learn or work due to the severity of their visual impairment. To help address this problem, Warby Parker works with nonprofit partners and government agencies in the United States and abroad to ensure that for every pair of glasses we sell, a pair is distributed to someone in need (“Buy a Pair, Give a Pair program”). To date, we have distributed over 3 million pairs of glasses to people in need around the globe through our Buy a Pair, Give a Pair program.
6. In 2015, we expanded our Buy a Pair, Give a Pair program to include the distribution of glasses to public schoolchildren in New York City (“Pupils Project”). In partnership with the City of New York and the New York City Department of Education’s Office of Community Schools and Office of School Health, Pupils Project has provided free vision screenings—and for those who need them, free eye exams and free prescription glasses—to 65,000 low-income students in more than 130 New York City Community Schools during each of the 2015-16 and 2016-17 academic school years. We have expanded Pupils Project to cover almost double that amount during the 2017-18 academic school year. Pupils Project has undoubtedly benefited children and their families who have been granted, or who would have been eligible for, the protections afforded by the Deferred Action for Childhood Arrivals Program (“DACA”). We believe that almost half of the children who will be covered by Pupils Project during the 2017-18 school year come from families who recently arrived in the United States.

7. Additionally, we are aware of at least one Warby Parker employee who is a grantee under DACA. However, because we have a policy of not inquiring whether our employees are DACA grantees, it is possible that Warby Parker currently employs—or will in the future employ—other grantees. We believe it is also likely that Warby Parker has sold prescription eyewear to DACA grantees across the United States, and we do so proudly.
8. Since Warby Parker's founding, we have deliberately built an inclusive community of employees and customers who have diverse backgrounds and perspectives. We strive to build a community of individuals from all walks of life, both internally at our offices, stores, and optical laboratory and externally with our customers and Buy a Pair, Give a Pair recipients. And we continually strive for improvement by giving our various stakeholders a voice within our organization and exploring opportunities to support their diverse interests.
9. Our commitment to inclusion and diversity does not stop at individuals who were born in the United States. Several Warby Parker employees and their family members were born outside of the United States and immigrated to this country as children, including our co-founder and co-CEO Dave Gilboa.
10. We firmly believe that protecting the future of young, undocumented immigrants is vital to our country's economy. Dreamers represent the best of American society—for instance, many have started their own businesses and give back to their communities—and their continued contributions to this country are critical to a thriving economy.
11. The decision to end DACA will harm our customers, our employees, our business, and our community. We believe that protecting the future of Dreamers is good business for Warby Parker and organizations like us; and it is simply the right thing to do.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of September, 2017.

A handwritten signature in black ink that reads "Adam Greenberg". The signature is written in a cursive, flowing style.

Adam Greenberg

EXHIBIT 108

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Pursuant to 28 U.S.C. § 1746(2), I, Angela Pinsky, hereby declare as follows:

1. I am over the age of eighteen and competent to testify.
2. I am the Executive Director of the Association for a Better New York, a non-profit membership organization for businesses and employers who advocate to make New York City a better place to live, work, and visit. ABNY has 266 members who employ hundreds of thousands of New Yorkers, and many which are national and multi-national organizations. All ABNY members have a presence in New York City and industries represented include construction/real estate, retail, professional services, cultural institutions, non-profit organizations, educational and medical institutions, finance, and infrastructure organizations. ABNY has 3 full time employees, none of which are DACA grantees.
3. ABNY has promoted the diversity of New York City as a strength for economic development, quality of life, competitiveness, and desirability. A major contributing factor is the percentage of "New New Yorkers" representing foreign born residents, as well as children of foreign born residents. According to the NYC Department of City Planning, in 2016 over 3 million of New York City's residents were immigrants (foreign-born individuals) doubling the percentage of immigrants since 1965 to 37%. Approximately 6-in-10 New Yorkers are either immigrants or the children of immigrants.
4. A wide variety of campaigns directed at individuals and organizations to locate in New York City highlight diversity of the population as a motivation, including towards individual businesses such as the "New York Open for Business" Campaign or the bid for the 2nd headquarters of Amazon; major national or international conventions including the NYC2012 Olympic Bid, the 2008 Republican National Convention, and the 2016 Democratic National Convention Bid; and even campaigns directed at individuals including the C'mon LeBron campaign of 2010.
5. According to FWD.US, there are 38,430 DACA recipients in New York State, 87% of whom are employed in the State, and if DACA is repealed and not replaced with a permanent legislative solution, New York will lose more than 33,400 workers and \$2.3 billion in annual GDP
6. The economic benefit of documented and undocumented immigrants and DACA grantees to the state is significant. According to the American Immigration Council, immigrant-led households in the state paid \$26.5 billion in federal taxes and \$15.9 billion in state and local taxes in 2014. Undocumented immigrants in New York paid an estimated \$1.1 billion in state and local taxes in 2014. Their contribution would increase to \$1.3 billion if they could receive legal status. Undocumented immigrants who were enrolled in the DACA program in 2016 paid an estimated \$140 million in state and local taxes.

I declare under penalty of perjury that the foregoing is true and correct.


Angela Pinsky

EXHIBIT 109

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

DECLARATION OF BASIL I. GOODEN

Pursuant to 28 U.S.C. § 1746(2), I, Basil I. Gooden, declare as follows:

1. I am the Secretary of Agriculture and Forestry for the Commonwealth of Virginia. In this capacity, I work to support the Governor's mission of building a new Virginia economy in agriculture and forestry, two of Virginia's largest private industries. I am also responsible for overseeing the Virginia Department of Agriculture and Consumer Services (VDACS).¹ I have personal knowledge of the matters set forth below or have knowledge of those matters based on my review of information and records gathered by employees of VDACS.
2. Virginia's agriculture and forestry industries have a combined annual economic impact of \$91 billion and provide more than 442,000 jobs in Virginia. Every job in agriculture and forestry supports 1.7 jobs elsewhere in Virginia's economy. According to a 2017 economic impact study by the University of Virginia's Weldon Cooper Center for Public Service, production agriculture employs nearly 54,000 farmers and workers in Virginia, and generates approximately \$3.8 billion in total output.² In addition, value-added industries, those that depend on farm commodities, employ more than 69,000 workers. When the employment and value-added impact of agriculture and forestry are considered together, they make up 9.5 percent of the state's total gross domestic product. In addition

¹ The responsibilities of the VDACS include promoting the economic growth and development of Virginia agriculture and forestry, including certifying pesticide applicators and issuing pesticide business licenses in Virginia, and regulating food manufacturing businesses, including retail food establishments in Virginia.

² Rephann, T.J. (2017, May). The Economic Impact of Virginia's Agriculture and Forestry Industries. Weldon Cooper Center for Public Service, University of Virginia. Retrieved from <http://www.vdacs.virginia.gov/pdf/weldoncooper2017.pdf>. See also <http://www.vdacs.virginia.gov/markets-and-finance-agriculture-facts-and-figures.shtml>.

to its tangible benefits such as farm cash receipts and jobs, agriculture provides many intangible benefits. These include recreation, tourism, wildlife habitat, biodiversity, flood mitigation, improved water quality and soil stabilization.

3. A report by the Migration Policy Institute (MPI), an independent, nonpartisan, nonprofit think tank that provides analysis of migration policies, estimates that 14,000 individuals enrolled in the Deferred Action for Childhood Arrivals (DACA) program work in farming, fishing and forestry occupations in the United States.³ This estimate represents about 3.6% of all individuals employed in farming, fishing and forestry occupations. Based on an extrapolation of the figures published in this MPI report, VDACS estimates approximately 1,944 of Virginia's 12,100 DACA recipients are likely employed in primary agricultural production.⁴
4. Several agriculture and forestry business owners, including in the area of logging, crop farming, and elsewhere, have expressed dire concern to me directly about their fear of losing their DACA enrolled employees with the termination of the DACA program. Because agriculture and forestry are two of Virginia's largest industries, the loss of DACA workers in this sector would have significant harmful impacts on both individual businesses and the Commonwealth's overall economy.
5. Annually, VDACS certifies approximately 6,500 private applicators, 7,000 commercial applicators, and 7,500 registered technicians to apply pesticides in Virginia. Based on the

³ Capps, R., Fix, M., & Zong, J. (2017, August). The Education and Work Profiles of the DACA Population, page 9. *Migration Policy Institute*. Retrieved from <http://www.migrationpolicy.org/research/education-and-work-profiles-daca-population>.

⁴ This estimate does not include DACA recipients employed in Virginia's forestry or fishing sectors.

occupational profile of DACA participants in the 2017 MPI report, a certain percentage of these pesticide applicators are projected to be enrolled in DACA. The loss of DACA participants in the pesticide sector would be detrimental to agricultural production in Virginia, pesticide businesses, homeowners, and result in a loss in revenue to VDACS from fees collected.

6. The August 2017 MPI report also estimates that approximately 16% of DACA recipients are employed in food preparation on serving operations nationally. There are more than 13,000 food based businesses under VDACS inspection. Since 2006, companies in the food and beverage sector have invested \$1.9 billion in Virginia. This sector would be face significant negative consequences by the loss of DACA participants.
7. The DACA eligible population in Virginia contributes significantly to the economic growth and development of Virginia's agriculture, forestry, and food-based industry. If DACA protections were lost as a result of the repeal or rollback of the DACA program, Virginia's economic growth and development in the area of agriculture, forestry and food manufacturing businesses including retail food establishments, would likely be harmed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on: September 27, 2017


Basil F. Gooden

EXHIBIT 110

Secretary
U.S. Department of Homeland Security
Washington, DC 20528



**Homeland
Security**

December 30, 2016

The Honorable Judy Chu
U.S. House of Representatives
Washington, DC 20515

Dear Representative Chu:

On behalf of the Administration, I write in response to the letter you and 110 other members of Congress sent the President on December 5. In your letter, you ask us "to do everything within [our] power to safeguard the personal identifying information of DACA enrollees." We share your concerns.

Today there are 750,000 young people enrolled in DACA who, when they applied for enrollment, relied on the U.S. government's representations about the use of their personal identifying information. Since DACA was announced in 2012, DHS has consistently made clear that information provided by applicants will be collected and considered for the primary purpose of adjudicating their DACA requests and would be safeguarded from other immigration-related purposes. More specifically, the U.S. government represented to applicants that the personal information they provided will not later be used for immigration enforcement purposes except where it is independently determined that a case involves a national security or public safety threat, criminal activity, fraud, or limited other circumstances where issuance of a notice to appear is required by law.

We believe these representations made by the U.S. government, upon which DACA applicants most assuredly relied, must continue to be honored.

For decades, even dating back before DACA, it has been the long-standing and consistent practice of DHS (and its predecessor INS) to use information submitted by people seeking deferred action or other benefits for the limited purpose of adjudicating their requests, and not for immigration enforcement purposes except in the kinds of specified circumstances described above. This was true, for example, under the deferred action policies extended to victims of human trafficking, to foreign students affected by Hurricane Katrina, to battered immigrants under the Violence Against Women Act, and to widows and widowers of American citizens. Accordingly, people who requested to be considered under DACA, like those who requested deferred action in the past, have relied on our consistent practice concerning the information they provide about themselves and others.

The Honorable Judy Chu

Page 2

The U.S. government's practice of adhering to the assurances it makes to applicants for deferred action is also consistent with the way USCIS (and the INS before it) has long protected information submitted by those seeking other benefits or relief. This includes but is not limited to individuals requesting temporary protected status, deferred enforced departure, or extended voluntary departure. In these circumstances, as with deferred action requests, USCIS and INS have abided by a longstanding and consistent practice of using information to adjudicate specific applications, but not for immigration enforcement purposes absent the limited circumstances described above.

Since DACA began, thousands of Dreamers have been able to enroll in colleges and universities, complete their education, start businesses that help improve our economy, and give back to our communities as teachers, medical professionals, engineers, and entrepreneurs—all on the books. We continue to benefit as a country from the contributions of those young people who have come forward and want nothing more than to contribute to our country and our shared future.

The co-signers of your letter will receive separate, identical responses. Should you wish to discuss this further, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeh Charles Johnson". The signature is stylized with a large, circular flourish on the left side and a long, horizontal stroke extending to the right.

Jeh Charles Johnson

EXHIBIT 111

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

I, Aldo Alan Solano Mendez, declare:

1. I have personal knowledge of the matter stated herein.
2. I work as a community organizer for the Oregon Latino Health Coalition where I was able to be part of the team that advocated for SB 558, Cover All Kids. My current employment is dependent on my status as a Deferred Action for Childhood Arrivals (DACA) recipient.
3. Previously, I worked as a Field Organizer for Accion Politica PCUNista and as a Program Coordinator for the Capaces Leadership Institute, contributing to the transformation of a more equitable and inclusive Oregon.
4. I pay income taxes in Oregon from my employment. I am 24 years old.
5. My family and I moved to Woodburn, Oregon when I was six years old from Colima, Mexico. I grew up in Nuevo Amanecer, one of Farmworker Housing Development Corporation's ("FHDC") affordable housing communities.
6. At age 15, I started volunteering at FHDC's after school program and later interned for the Fund Development Department, creating a pathway to a career in community development and a passion for social equity. In 2011, I graduated from Woodburn High School. I attended Chemeketa Community College for a year through a scholarship program that existed at the time.
7. In August of 2012, I became one of the first Oregonians to apply for the DACA program. My application was approved later that year, and I have remained in the program ever since. My deferred action status expires in October of 2018 if it is not renewed. In addition to the community organizing jobs mentioned above I have worked in a variety of jobs in Oregon since entering the DACA program, including retail, working in a call center, and working at a library. I paid taxes on my earnings from each of those jobs.

8. I have recently moved to Portland, Oregon from Woodburn, Oregon, and plan to attend Portland Community College this fall or winter. I plan to study nursing. If DACA ends, however, I may need to change that plan. If I cannot work, I cannot afford to attend school.

9. I have not been to back to Mexico since I was 10 years old. I have a younger sister and an older brother in the DACA program. My siblings have young children who are U.S. citizens. I am very concerned that if the program ends my family will be separated.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED September 5, 2017.



ALDO ALAN SOLANO MENDEZ

EXHIBIT 112



Donald J. Trump ✓

@realDonaldTrump

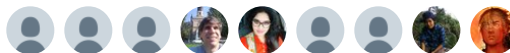
Follow



Does anybody really want to throw out good, educated and accomplished young people who have jobs, some serving in the military? Really!.....

3:28 AM - 14 Sep 2017

18,441 Retweets 82,905 Likes



43K



18K

83K



American Pride @usaforyoubruv · Sep 14



Replying to @realDonaldTrump

If u have to make a choice, that's the only ones to keep although it's unfair to those who waited years and spent a fortune to come legally

17

31

266



American Pride @usaforyoubruv · Sep 14



They already broke the law by coming here illegally. What other laws did they break to find work? False SSNs, not paying tax etc.

61

87

457



American Pride @usaforyoubruv · Sep 14



They were given benefits like free college and were prioritized ahead of American kids. That's unfair. American kids had and have dreams too

53

105

488



American Pride @usaforyoubruv · Sep 14

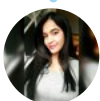


majority were not vetted & many may be working with kids or vulnerable adults. That's a concern. Tough rules needed. No criminal record

22

37

216



Romo @romod1997 · Sep 14



Daca can't receive anything from the government. They have to go through a long process to get it. They can't have criminal records